

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-SLR-LPS
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME  
OUT OF TIME PURSUANT TO FED. R. CIV. P. 6(b)2**

Defendants Stanley Taylor, Joyce Talley, Tony Figario, Carl Anson, Michael Knight, Chris Senato, Joseph Atkins, Debbie Melvin, Richard Crockett, Richard Manuel, Weston White, Steven Raynor and Bethany Evans (“Defendants”), by and through undersigned counsel, respectfully request this Honorable Court to enter an Order granting an enlargement of time of an additional eight days within which to file a consolidated Reply Brief. In support of this motion, Defendants offer the following:

1. Defendants previously requested a ten (10) day extension of time to reply to the submissions of three Plaintiffs in this matter. The submissions were docketed as “Answering Briefs” in D.I.264,265 and 266.
2. On June 30, 2008, the day Defendants were to file their Reply Brief, they received a submission from another Plaintiff, Rique Reynolds, also in opposition to the Defendants’ motion for summary judgment. D.I.270.
3. On July 1, 2008, another Plaintiff (Carl Walker) submitted a declaration in opposition to Defendants’ motion for summary judgment. D.I.271.

4. On July 2, 2008, Plaintiff Darwin Savage's declaration against the Defendants' motion for summary judgment was docketed by the Clerk of Court. D.I.272.

5. In the interests of judicial economy, because the Plaintiffs' submissions contain common issues, Defendants wish to submit a single reply brief to deal with these six (6) responses to their motion for summary judgment.

6. This is the Defendants' second request for an extension of time to file Reply Briefs in this matter. As indicated above, the purpose of the extension is to file a consolidated reply brief; as an extension of time is not required to respond to the most recently filed documents. D.I.270,271,272.

7. A proposed form of order is attached to this motion that will grant the Defendants an extension until July 8, 2008, in which to file the Defendants' Reply Brief.

WHEREFORE, for the hereinabove reasons, the Defendants respectfully request that the Court grant the herein motion for an extension of time and set the deadline for filing a response for July 8, 2008.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi, ID #3823  
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Attorney for Defendants

Dated: July 3, 2008

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GEORGE A. JACKSON, et al.,	)	
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Defendants.	)	

**7.1.1 CERTIFICATION OF COUNSEL**

The counsel for the Defendants, Deputy Attorney General Catherine Damavandi, files this certification in compliance with Rule 7.1.1 of the Local Rules of Civil Procedure and certifies that:

1. Plaintiffs are inmates incarcerated in the Delaware Correctional system, at the Sussex Correctional Institution and the Delaware Correctional Center.
2. Since the Plaintiffs are not able to be reached by telephone counsel for the Defendants has spent no time in attempting to reach an agreement on the subject of the motion for enlargement of time.
3. She assumes the motion is opposed.

DEPARTMENT OF JUSTICE  
STATE OF DELAWARE

/s/ Catherine Damavandi  
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Defendants.	)	

***CERTIFICATE OF SERVICE***

I hereby certify that on July 3, 2008, I electronically filed *Defendants' Motion for Enlargement of Time Out of Time to File Reply Briefs* with the Clerk of Court using CM/ECF. I further certify that on July 3, 2008, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

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